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5 Attorneys for Plaintiffs

The Honorable Bryan D. Lynch
Chapter 11
Date: 12/14/2017
Time: 9:30 a.m.

9
10 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

11 In re:
12 CDC PROPERTIES I, LLC,
13 Debtor.

14 OLYMPIA OFFICE, LLC, a New York limited
liability company; WA PORTFOLIO, LLC, a
15 Delaware limited liability company;
MARINERS PORTFOLIO, LLC, a Virginia
16 limited liability company; and SEAHAWK
PORTFOLIO, LLC, a Florida limited liability
17 company,

18 Plaintiffs,

19 v.

20 MLMT 2005-MCP1 WASHINGTON OFFICE
PROPERTIES, LLC, a Washington limited
liability company; MIDLAND LOAN
21 SERVICES, a division of PNC BANK, N.A.;
RAINIER FORECLOSURE SERVICES, INC.,
22 a Washington corporation; JSH PROPERTIES,
INC., a Washington corporation,

23 Defendants.

NO. 11-41010-BDL

ADV. NO. 17-04120-BDL

DECLARATION OF DANIEL A. BROWN
IN SUPPORT OF EMERGENCY MOTION
FOR SHORTENED TIME FOR HEARING
ON PLAINTIFFS' EMERGENCY
MOTION FOR PRELIMINARY
INJUNCTION OR TEMPORARY
RESTRANDING ORDER

24
25 DECLARATION OF DANIEL A. BROWN IN SUPPORT OF
EMERGENCY MOTION FOR SHORTENED TIME FOR HEARING
ON PLAINTIFFS' EMERGENCY MOTION FOR PRELIMINARY
INJUNCTION OR TEMPORARY RESTRAINING ORDER - 1

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1
2 I, Daniel A. Brown, declare as follows:

3 1. I am a partner at Williams Kastner, attorneys for plaintiffs in this action,
4 and I make this declaration based on my personal knowledge. If called to testify I would be
5 competent to do so.

6 2. Attached as **Exhibit A** is a true and correct copy of the Plaintiffs'
7 Motion for Preliminary Restraining Order filed in King County Superior Court Case No. 17-2-
8 31354-8 SEA ("King County Case") on December 6, 2017.

9 3. Attached as **Exhibit B** is a true and correct copy of the Order to Show
10 Cause entered in the King County Case on December 6, 2017.

11 4. Attached as **Exhibit C** is a true and correct copy of the Declaration of
12 Scott Switzer and exhibits filed in the King County Case in support of the Motion for
13 Preliminary Injunction.

14 5. Attached as **Exhibit D** is a true and correct copy of the Declaration of
15 David M. Chudzik, Ph.D and exhibits filed in the King County Case in support of the Motion
16 for Preliminary Injunction.

17 6. Attached as **Exhibit E** is a true and correct copy of the Complaint in the
18 King County Case.

19 7. Attached as **Exhibit F** is a true and correct copy of the Affidavit of
20 Service on Rainier Foreclosure Services, filed in the King County Case.

21 The foregoing statement is made under penalty of perjury under the laws of the United
22 States of America and is true and correct.

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24
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ON PLAINTIFFS' EMERGENCY MOTION FOR PRELIMINARY
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1 DATED this 12th day of December, 2017.

2 /s/ Daniel A. Brown

3 Daniel A. Brown, WSBA #22028
4 Marshall L. Ferguson, WSBA #29528
5 Daniel J. Velloth, WSBA #44379
6 Attorneys for Plaintiffs Olympia Office, LLC;
7 WA Portfolio, LLC; Mariners Portfolio, LLC;
8 and Seahawk Portfolio, LLC
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PROOF OF FILING

The undersigned hereby certifies that on December 12, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants.

DATED this 12th day of December, 2017.

/s/ Daniel A. Brown
Daniel A. Brown, WSBA #22028
Marshall L. Ferguson, WSBA #29528
Daniel J. Velloth, WSBA #44379
Attorneys for Plaintiffs Olympia Office, LLC;
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